

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Revision of the Commission's rules) CC Docket No. 94-102
to ensure compatibility with)
enhanced 911 emergency calling systems)

COMMENTS OF IDB MOBILE COMMUNICATIONS, INC.

IDB Mobile Communications, Inc. ("IDB Mobile") hereby submits these comments in response to the Notice of Proposed Rulemaking released by the Commission on October 19, 1994 in the above-captioned proceeding ("Notice"). In its Notice, the Commission seeks comment on what types of mobile radio services should be subject to its proposed new 911 emergency regulations. IDB Mobile submits that, for technical and practical reasons, the Commission should not apply its enhanced 911 emergency rules to international mobile satellite services.

I. INTRODUCTION AND BACKGROUND

IDB Mobile provides international mobile satellite services to commercial and private aviation, maritime, and land-mobile users worldwide. These services include maritime mobile satellite services ("MMSS"), land mobile satellite services ("LMSS"), and aeronautical mobile satellite services ("AMSS"). IDB Mobile provides its global services by combining space segment obtained from the International Maritime Satellite Organization ("INMARSAT"), the de facto monopoly provider of

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international mobile satellite services, with land earth station facilities owned by IDB Mobile.

II. INTERNATIONAL MOBILE SATELLITE SERVICES SHOULD NOT BE SUBJECT TO THE COMMISSION'S PROPOSED NEW 911 EMERGENCY RULES

In its Notice, the Commission proposes to adopt rules "that would require wireless services, in particular commercial mobile radio services (CMRS) that provide real time voice services, to include features that will make enhanced 911 services available to mobile radio callers."^{1/} Enhanced 911 service features include Station Number Identification (SNI), Automatic Location Information (ALI), Selective Routing (SR), and other features for 911 calls that are already provided to wireline telephone customers.^{2/} The Commission tentatively defines the category of services that will be required to provide enhanced 911 emergency services to its customers as "mobile radio services offering access to real-time voice services provided on the public switched network...."^{3/} The Notice seeks comment as to the "social, economic, and other costs" of including various categories of mobile radio services in its 911 compatibility requirements, including "mobile satellite services."^{4/}

^{1/} Notice at para. 1 (footnote omitted).

^{2/} Id.

^{3/} Id. at para. 38.

^{4/} Id.

IDB Mobile submits that it is not appropriate to include international mobile satellite services in the Commission's definition of services subject to its proposed new 911 emergency rules. First, it is simply impossible to apply the Commission's proposed new rules to international aeronautical and maritime mobile satellite services. For aeronautical services, the AMSS end user is located in an airborne airplane; as a result, ground-based emergency services would be physically unable to provide any assistance to the end user. Similarly, maritime services are utilized only by MMSS end users located on ships at sea, where ground-based emergency services could not reach the end users. Thus, for this reason alone, the FCC's proposed domestic 911 service requirement is wholly incompatible with the nature of these mobile satellite services.

It also would be impracticable to apply the Commission's proposed new rules to international land mobile satellite services. For LMSS service, the end user is permitted to utilize the service only while the mobile terminal is located in a foreign country outside the United States. As a result, no U.S.-based emergency services would be able to reach the non-U.S.-based user.^{5/} As in the case of international aeronautical and maritime mobile satellite services, the very nature of interna-

^{5/} In addition, the terminal equipment currently utilized by land-based end users is not compatible with a new 911 service requirement because it does not include emergency functions. The cost of adding such features would greatly increase the price of the equipment, and the service, for the end user.

tional land mobile satellite services makes them incompatible with the FCC's proposed 911 service rules.

Aside from the impossibility of ground-based emergency assistance even reaching end users of international maritime mobile satellites services, it is also wholly unnecessary to apply the Commission's proposed 911 service rules to international MMSS. INMARSAT already has a priority distress system, called Global Maritime Distress and Safety System (GMDSS), which takes the place of 911 number service. All GMDSS calls are automatically routed to the Rescue Coordination Center (RCC) of the individual countries of the earth station of choice. With GMDSS in place, 911 service is not needed for maritime services.^{6/} In addition, it would be technically infeasible to subject international maritime mobile satellite services to the FCC's proposed new 911 emergency rules because Automatic Location Information (ALI) cannot be provided. By the use of an advanced functionality called "ocean hunting," IDB Mobile currently is only able to determine that a particular ship is located in one of four possible ocean regions. It is impossible for IDB Mobile to locate the precise position of any one ship within an ocean region. An ALI requirement would be incompatible with current technology and service standards used for international maritime mobile satellites services.

^{6/} Moreover, for maritime calls placed from sea vessels in U.S. territorial waters, the United States Coast Guard is always available to handle distress calls.

III. CONCLUSION

For the reasons set forth above, IDB Mobile respectfully requests that the Commission not apply its proposed new emergency 911 requirements to international mobile satellite services.

Respectfully submitted,

IDB MOBILE COMMUNICATIONS, INC.



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CERTIFICATE OF SERVICE

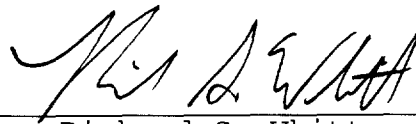
I, Richard S. Whitt, do hereby certify that I have this 9th day of January, 1995, caused to be served by hand delivery copies of the foregoing "Comments of IDB Mobile Communications, Inc." in CC Docket No. 94-102 to the following:

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